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14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBITS TO THEIR DISCOVERY  
LETTER BRIEF REGARDING APEX  
DEPOSITIONS**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal exhibits to their discovery letter brief regarding apex depositions. Specifically, Defendants request an order granting leave to file under seal the following documents:

Document	Portions to Be Filed Under Seal
Exhibit A	Entire Document
Exhibit B	Entire Document

These exhibits have been designated by Waymo as “Highly Confidential – Attorneys’ Eyes Only” in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed govern this case (Transcript of 3/16/2017 Hearing, page 6). Defendants do not agree that this material merits sealing, but are required to file this material under seal in accordance with Paragraph 14.4 of the Protective Order.

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on July 6, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and designate the service copies of these documents as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

Dated: July 6, 2017

MORRISON & FOERSTER LLP

By: /s/Arturo J. González  
ARTURO J. GONZÁLEZ

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